

---

# United States District Court

Western

DISTRICT OF

Missouri

UNITED STATES OF AMERICA

v.

RAYMOND A. DELACRUZ  
[DOB: xx/xx/82]

18 U.S.C. § 2113(a), (d)  
NMT 25 Years Imprisonment  
NMT \$250,000 Fine  
NMT 5 Years Supervised Release  
\$100 Mandatory Special Assessment  
Class B Felony

## CRIMINAL COMPLAINT

**Case Number: 06-0050-REL-01**

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about March 28, 2006, in Kansas City, Missouri, Jackson County, in the Western District, the defendant Raymond A Delacruz, did by force, intimidation and violence, take and cause to be taken from bank employees, approximately \$9,311.00 in money belonging to and in the care, custody, control, management and possession of First National Bank of Missouri, 10725 Independence Avenue, Independence, Missouri, an institution where deposits were then insured by the Federal Deposit Insurance Corporation (FDIC), and in committing the foregoing offense, the defendant assaulted and put in jeopardy, and caused to be assaulted and placed in jeopardy, the lives of bank employees of First National Bank of Missouri, by the use of a dangerous weapon, that is, a handgun, all in violation of 18 U.S.C. § 2113(a), (d).

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts: (See attached Affidavit)

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No.

\_\_\_\_\_  
Special Agent Ronda Schell  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

March 29, 2006  
Date

at

Kansas City, Missouri  
City and State

ROBERT E. LARSEN  
United States Magistrate t Judge  
\_\_\_\_\_  
Name and Title of Judicial Officer

\_\_\_\_\_  
Signature of Judicial Officer